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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

STATE OF CALIFORNIA, et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA, et al.,

Defendants.

Case No. 4:25-cv-04966-HSG

**[PROPOSED] ORDER GRANTING  
DEFENDANTS' ADMINISTRATIVE  
MOTION FOR STAY OF ALL  
PROCEEDINGS DUE TO LAPSE IN  
APPROPRIATIONS**

1 Upon consideration of Defendants' motion for a stay, and the entire record herein, it is  
2 hereby

3 **ORDERED** that the motion is **GRANTED**; it is further

4 **ORDERED** that all proceedings in this matter are **STAYED** through the duration of the  
5 current lapse in appropriations; it is further

6 **ORDERED** that Defendants shall file a notice with the Court when appropriations are  
7 restored; and it is further

8 **ORDERED** that, within 10 days of that notice, the parties shall meet and confer and then  
9 jointly propose a schedule for further proceedings (or separate proposals, if they cannot reach  
10 agreement).

11 **SO ORDERED.**

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18 Dated: \_\_\_\_\_, 2025

19  
20 \_\_\_\_\_  
THE HONORABLE HAYWOOD S. GILLIAM, JR.  
United States District Judge

1 Dated: October 29, 2025

Respectfully submitted,

2 ADAM R.F. GUSTAFSON

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